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2 District of Arizona

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7 Attorneys for Plaintiff

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE DISTRICT OF ARIZONA

10 United States of America,

11 Plaintiff,

19-33822M - LAB

12 vs.

13 **Salvador LUNES-Hernandez,
aka: Salvador De La Cruz-Lunez,**

**MOTION TO DISMISS COMPLAINT
AND VACATE CONVICTION**

14 Defendant.
15

16 Pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, 18 U.S.C. §5031
17 et seq., and by leave of Court, the United States Attorney for the District of Arizona,
18 through undersigned counsel hereby moves the court to dismiss the above-captioned
19 complaint with prejudice and vacate the conviction against the above-named defendant.
20 The government requests an order immediately releasing the defendant from further
custody in this criminal matter.

21 Respectfully submitted this 9 September 2019.

22 MICHAEL BAILEY
23 United States Attorney
24 District of Arizona
25 /ss/ Christopher J. Lewis
Special Assistant U.S. Attorney

26 Copy of the foregoing served electronically or by other means,
27 this 9 September 2019 to:

28 Attorney for Defendant: Vincent L. Lacsamana, Esq.